

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
(Greenbelt Division)**

<b>In re:</b>	)	
	)	
<b>WILLIAM CHARLES BEVAN</b>	)	<b>Case No. 22-12609</b>
	)	<b>(Chapter 7)</b>
	)	
_____	)	

**RESPONSE ON DEBTOR’S RENEWED MOTION TO RECONSIDER OBJECTION  
TO EXEMPTION AND TO DIRECT TRUSTEE TO DISBURSE EXEMPT PROPERTY TO  
DEBTOR FROM PARTY IN INTEREST THE BURNS LAW FIRM, LLC AND JOHN BURNS  
(AND REQUEST FOR HEARING)**

John Burns and The Burns LawFirm, LLC (collectively, “Mr. Burns”) through undersigned counsel, Timothy Carey, Esquire, and WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER, LLP, hereby file this Response on Debtor’s Renewed Motion to Reconsider Objection to Exemption and to Direct Trustee to Disburse Exempt Property [Dkt. 600] (the “Response”), with Request for Hearing, and in the interest of brevity hereby incorporates the Preliminary Response on the Debtor’s original Motion to Reconsider Objection to Exemption and to Direct Trustee to Disburse Exempt Property to Debtor [Dkt. 558].

Mr. Burns reserves the right to further respond to the Motion. Nothing herein shall be construed to: (a) constitute an admission; (b) constitute a waiver of any of Mr. Burns’ rights; or (c) prejudice Mr. Burns’ rights at law, equity or otherwise. Mr. Burns expressly reserves all of its rights and shall argue on all authorities at the hearing on the Motion.

WHEREFORE, Mr. Burns respectfully requests that this Bankruptcy Court enter an Order (i) Denying the Motion; (ii) Granting such other and further relief as equity and justice may require.

Respectfully submitted,

**WILSON, ELSER, MOSKOWITZ,  
EDELMAN & DICKER LLP**

/s/ Timothy S. Carey

Timothy S. Carey (Bar #19856)  
250 W. Pratt Street, Suite 2200  
Baltimore, MD 21201  
410-539-1800 (Main)  
410-962-8758 (Fax)  
Timothy.Carey@wilsonelser.com

/s/ Matthew W. Lee

Matthew W. Lee (Bar #27949)  
8444 Westpark Drive, Suite 510  
McLean, VA 22102  
703-852-7788 (Main)  
703-245-9301 (Fax)  
Matthew.Lee@wilsonelser.com

*Attorneys for John Burns and The Burns  
Law Firm, LLC*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 19th day of September 2025, I served the foregoing Line electronically, via CM/ECF upon:

**Donald L Bell** [donbellaw@gmail.com](mailto:donbellaw@gmail.com),  
[admin@donbellaw.com](mailto:admin@donbellaw.com); [bell.donaldr125259@notify.bestcase.com](mailto:bell.donaldr125259@notify.bestcase.com)

• **Anthony Joseph DiPaula** [ajdipaula@dipaulalaw.com](mailto:ajdipaula@dipaulalaw.com), [cevans@dipaulalaw.com](mailto:cevans@dipaulalaw.com)

• **Justin Philip Fasano** [jfasano@mhlawyers.com](mailto:jfasano@mhlawyers.com), [jfasano@ecf.courtdrive.com](mailto:jfasano@ecf.courtdrive.com);  
[dmoorehead@mhlawyers.com](mailto:dmoorehead@mhlawyers.com); [tmackey@mhlawyers.com](mailto:tmackey@mhlawyers.com); [hleaphart@mhlawyers.com](mailto:hleaphart@mhlawyers.com);  
[cmartin@mhlawyers.com](mailto:cmartin@mhlawyers.com); [Fasano.JustinR92003@notify.bestcase.com](mailto:Fasano.JustinR92003@notify.bestcase.com)

• **Nikita Rajendra Joshi** [Nikita.Joshi@bww-law.com](mailto:Nikita.Joshi@bww-law.com), [bankruptcy@bww-law.com](mailto:bankruptcy@bww-law.com)

• **Nicole C. Kenworthy** [bdept@mrrlaw.net](mailto:bdept@mrrlaw.net)

• **M. Evan Meyers** [bdept@mrrlaw.net](mailto:bdept@mrrlaw.net)

• **Janet M. Nesse** [jnesse@mhlawyers.com](mailto:jnesse@mhlawyers.com), [DC0N@ecfcbis.com](mailto:DC0N@ecfcbis.com);  
[jmnesse@ecf.axosfs.com](mailto:jmnesse@ecf.axosfs.com); [jfasano@mhlawyers.com](mailto:jfasano@mhlawyers.com); [cpalik@mhlawyers.com](mailto:cpalik@mhlawyers.com);  
[tmackey@mhlawyers.com](mailto:tmackey@mhlawyers.com); [Nesse.JanetR92003@notify.bestcase.com](mailto:Nesse.JanetR92003@notify.bestcase.com);  
[kfeig@mhlawyers.com](mailto:kfeig@mhlawyers.com)

• **Jeffrey M. Orenstein** [jorenstein@wolawgroup.com](mailto:jorenstein@wolawgroup.com)

• **Daniel J. Pesachowitz** [dpesacho@siwpc.com](mailto:dpesacho@siwpc.com),  
[rjones@siwpc.com](mailto:rjones@siwpc.com); [bkreferrals@siwpc.com](mailto:bkreferrals@siwpc.com); [siwbkecf@siwpc.com](mailto:siwbkecf@siwpc.com); [siwpc@ecf.courtdrive.com](mailto:siwpc@ecf.courtdrive.com);  
[siwattecf@siwpc.com](mailto:siwattecf@siwpc.com)

• **Daniel M. Press** [dpress@chung-press.com](mailto:dpress@chung-press.com), [pressdm@gmail.com](mailto:pressdm@gmail.com)

• **L. Jeanette Rice** [Jeanette.Rice@usdoj.gov](mailto:Jeanette.Rice@usdoj.gov), [USTPRegion04.GB.ECF@USDOJ.GOV](mailto:USTPRegion04.GB.ECF@USDOJ.GOV)

• **William Mark Rudow** [williamrudow@rudowlaw.com](mailto:williamrudow@rudowlaw.com)

• **Dorothy Carol Sasser** [dsasser@siwpc.com](mailto:dsasser@siwpc.com), [bkreferrals@siwpc.com](mailto:bkreferrals@siwpc.com); [siwbkecf@siwpc.com](mailto:siwbkecf@siwpc.com);  
[siwpc@ecf.courtdrive.com](mailto:siwpc@ecf.courtdrive.com); [siwattecf@siwpc.com](mailto:siwattecf@siwpc.com)

• **William Frederick Steinwedel** [wsteinwedel@mdlab.org](mailto:wsteinwedel@mdlab.org), [roithamer21988@gmail.com](mailto:roithamer21988@gmail.com);  
[G21117@notify.cincompass.com](mailto:G21117@notify.cincompass.com)

*/s/ Timothy S. Carey*

Timothy S. Carey

